



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Alec Poitevint, Treasurer  
Republican National Committee - RNC  
310 First Street, S.E.  
Washington, DC 20003

NOV 8 2000

Identification Number: C00003418

Reference: July Monthly Report (6/01/00-6/30/00)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-In accordance with 11 CFR 104.8(e), a National Party Committee shall disclose in a memo Schedule A, information about each individual, committee, corporation, labor organization, or other entity that donates in excess of \$200 in a calendar year to the committee's non-federal account(s). Furthermore, in accordance with 11 CFR 104.9(c), a National Party Committee shall report in a memo Schedule B the full name and mailing address of each person to whom a disbursement in an aggregate amount or value in excess of \$200 within the calendar year is made from the committee's non-federal account(s), together with the date, amount and purpose of such disbursement.

Advisory Opinion 1992-33 discloses alternative methods for reporting the receipt of these contributions on the Committee's I Schedules. The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. In addition, in order to reflect the fact that the reported in-kind donations have been expended in the same period as received by the committee, the total amount of the in-kind contributions should be entered on Line 5 of Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1. Alternatively, the committee may include the total amount

REPUBLICAN NATIONAL COMMITTEE - RNC

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of the in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your reports to accurately disclose the non-federal in-kind contributions in accordance with one of the methods described above.

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule H4 of your report discloses what appear to be voided checks for shared expenditures made during prior reporting periods (pertinent portions attached). In addition, you have disclosed negative transactions on Schedule H3 which appear to be the non-federal share of these voided checks. If this is the case, please be advised that the non-federal portion of these voided checks should be transferred back to the non-federal account and not disclosed as negative amounts on Schedule H3. Please provide further clarification regarding this activity and amend the appropriate report(s). In addition, please clarify if and when these checks were reissued. If they were not reissued, please clarify the steps your committee has taken to account for the federal portion of these voided checks.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules H4 and B of your report to clarify the following description(s): "consulting". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please clarify all expenditures made for "Broadcast Cost", "Broadcasting Cost", "Ad Cost" and "Media Buy" on Schedules H4 and B. If a portion or

all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Memo Schedule B supporting Line 2 of Schedule I of your committee's "RNSEC - Administrative Account" discloses \$100,000 in transfers to your federal account. However, this transfer has not been disclosed on Schedule H3 of your report. Please clarify this discrepancy.

-Schedule H3 of your report discloses \$2,127,200.53 in transfers from your "Republican National State Election Committee" non-federal account. The sum of the entries on memo Schedule B for Line 2 of Schedule I, however, indicates the total to be \$1,893,064.73. Please clarify this discrepancy.

-The disclosure of some administrative expenses on Schedule H4 appear to be 100% non-federal activities. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Schedule H2 indicates the allocation ratio for K6 was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-Schedules H2 and H4 disclose 100% non-federal activity for the fundraiser denoted as K6. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

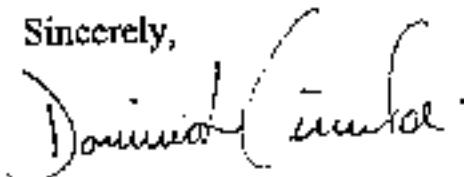
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-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers out to your non-federal account of both excessive contributions and excessive transfers should be properly disclosed on a separate Schedule B, supporting Line 22 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

DISBURSEMENT SCHEDULE #4  
REC DATE: 07/11/00

REPUBLICAN NATIONAL COMMITTEE  
JOINT FEDERAL/STATE FEDERAL  
ACTIVITY SCHEDULE

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
			FEDERAL	NON-FEDERAL
U.S. POSTMASTER	DATE: 06/01/00 PURPOSE: POSTAGE CATEGORY: FUNDRAISING EVENT: T6 EVENT \$YTD:	\$9.00	8.91	.09
WASHINGTON DC 20003				
U.S. POSTMASTER	DATE: 06/07/00 PURPOSE: POSTAGE CATEGORY: FUNERAL/RISING EVENT: T6 EVENT \$YTD:	\$94.964.40	74.25	750.75
WASHINGTON DC 20003				
U.S. POSTMASTER	DATE: 06/27/00 PURPOSE: POSTAGE CATEGORY: FUNDRAISING EVENT: T6 EVENT \$YTD:	\$9.00	8.91	.09
WASHINGTON DC 20003				
REFLECTIONS PHOTOGRAPHY, INC.	DATE: 06/08/00 PURPOSE: PHOTOGRAPHY COST	413.50	376.13	37.38
6408-B SEVEN CORNERS PL.	CATEGORY: FUNDRAISING			
FAIR'S CHURCH VA 22044	EVENT: T6 EVENT \$YTD:	\$94.964.40		
REGAL RENT	DATE: 06/08/00	6,144.158	5,593.01	551.57
2310 E. IMPERIAL HIGHWAY	PURPOSE: RENTALS			
BL. SECUNDO CA 90245	CATEGORY: FUNDRAISING			
REFECTORY CLUB	EVENT: T6 EVENT \$YTD:	\$94.964.40	182.46	1,804.83
10300 WILSHIRE BLVD.	DATE: 06/15/00	2,022.29		
LOS ANGELES CA 90034	PURPOSE: CATERING			
SISTER ROBINSON	CATEGORY: FUNDRAISING			
THE LEXINGTON AT WKT SQ	EVENT: T6 EVENT \$YTD:	\$94.964.40	-162-.50	-3,087.50
400 8TH ST NW	PURPOSE: VCD+09510- 4/3E/00			
WASHINGTON DC 20004	CATEGORY: FUNDRAISING			
	EVENT: T4 EVENT \$YTD:	\$47,445.84		
	PAGE TOTAL	6,357.37	702.16	5,656.21

DISTRIBUTMENT SCHEDULE H4  
RWS DATE: 07/31/04

REPUBLICAN NATIONAL COMMITTEE  
JOINT FEDERAL/NGN FEDERAL  
ACTIVITY SCHEDULE

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
JENNIE JOHNSON PHILLIPS 5516 CRUFT BLVD DALLAS TX 75209	DATE: 06/29/00 PURPOSE: LODGE, TRAMS CATEGORY: FUNDRAISING EVENT: E6 EVENT \$YTD: \$88,923.94	307.00	227.34	79.84
STEVEN ROBINSON THE LEKINGTON AT MET SQ 400 8TH ST NW WASHINGTON DC 20004	DATE: 06/07/00 PURPOSE: VOID CHECK #95010 04/28/00 CATEGORY: FUNDRAISING EVENT: B4 EVENT \$YTD: \$25,435.82	-3,250.00	-1,982.50	-1,267.50
SOPH CREEK P.O. BOX 932058 ATLANTA GA 31193-2058	DATE: 06/22/00 PURPOSE: SUPPLIES CATEGORY: FUNDRAISING EVENT: E6 EVENT \$YTD: \$88,923.94	66.75	49.40	17.36
BETH STURGEON 1004 ECHO LN AUSTIN TX 78745	DATE: 06/22/00 PURPOSE: MEALS, PARKING CATEGORY: FUNDRAISING EVENT: E6 EVENT \$YTD: \$88,923.94	18.34	13.57	4.77
BETH STURGEON 1004 ECHO LN AUSTIN TX 78745	DATE: 06/22/00 PURPOSE: MEALS, LODGE, TRAMS, PARK CATEGORY: FUNDRAISING EVENT: B6 EVENT \$YTD: \$88,923.94	176.00	130.89	45.99
BETH STURGEON 1004 ECHO LN AUSTIN TX 78745	DATE: 06/22/00 PURPOSE: PARKING CATEGORY: FUNDRAISING EVENT: E6 EVENT \$YTD: \$88,923.94	126.00	93.24	32.76
BETH STURGEON 1004 ECHO LN AUSTIN TX 78745	DATE: 06/29/00 PURPOSE: LODGE, MEAL, PARK CATEGORY: FUNDRAISING EVENT: E6 EVENT \$YTD: \$88,923.94	744.53	550.95	193.58
PAGE TOTAL		-1,810.42	-917.21	-993.21

DISBURSEMENT SCHEDULE H4  
RUN DATE : 07/11/04

REPUBLICAN NATIONAL COMMITTEE  
JOINT FEDERAL/NON FEDERAL  
ACTIVITY SCHEDULE

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
STEVEN ROBINSON THE LEXINGTON AT MET SO 400 8TH ST NW WASHINGTON DC 20004	DATE: 06/07/04 PURPOSE: VOID CHECK 85010 04/28/00 CATEGORY: FUNDRAISING EVENT: M4 EVENT \$YTD:	-3,250.00	-2,957.50	-2,92.50
STEVEN ROBINSON THE LEXINGTON AT MET SO 400 8TH ST NW WASHINGTON DC 20004	DATE: 06/07/04 PURPOSE: VOID CHECK 85010 04/28/00 CATEGORY: FUNDRAISING EVENT: M4 EVENT \$YTD:	-3,250.00	-2,957.50	-2,92.50
RST MARKETING ASSOC., INC. 212 CORPORATE PARK ROAD FOREST VA 24551	DATE: 06/01/04 PURPOSE: POSTAGE CATEGORY: FUNDRAISING EVENT: M6 EVENT \$YTD:	639.00	647.98	151.02
RST MARKETING ASSOC., INC. 212 CORPORATE PARK ROAD FOREST VA 24551	DATE: 06/01/04 PURPOSE: POSTAGE CATEGORY: FUNDRAISING EVENT: M6 EVENT \$YTD:	646,109.47	4,276.44	3,505.68
SPECIAL EVENTS & UNION STATION DATE: 06/29/04 50 MASS. AVE., NE	PURPOSE: MEETING COST CATEGORY: FUNDRAISING EVENT: M6 EVENT \$YTD:	4,086.63	4,007.04	879.59
WASHINGTON DC 20002	\$46,109.47			
SPECIAL EVENTS & UNION STATION DATE: 06/29/04 50 MASS. AVE., NE	PURPOSE: MEETING COST CATEGORY: FUNDRAISING EVENT: M6 EVENT \$YTD:	4,086.64	4,007.04	879.60
WASHINGTON DC 20002	\$46,109.47			
D.C. TREASHER-SALES & USE TAX DATE: 06/16/04 P.O. BOX 679 BEN FRANKLIN STATION WASHINGTON DC 20004	PURPOSE: SALES/USE TAX CATEGORY: FUNDRAISING EVENT: P6 EVENT \$YTD:	25.69	5.16	20.70
	PAGE TOTAL	6,414.59	6,298.92	2,115.67

DISBURSEMENT SCHEDULE #4  
RTW DATE: 07/11/04

REPUBLICAN NATIONAL COMMITTEE  
JOINT FEDERAL/JOHN FEDERAL  
ACTIVITY SCHEDULE

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
REFLECTIONS PHOTOGRAPHY, INC. 640B-P SEVEN CORNERS PL.	DATE: 06/29/04 PURPOSE: PHOTOGRAPHY COST CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	\$3,933	10,79	43,14
PHIL'S CHURCH VA 22044	DATE: 06/07/04 PURPOSE: VOID CHECK #5010 04/26/00 CATEGORY: FUNDRAISING EVENT: #4 EVENT SYTD:	-\$3,260.00		-\$2,925.00
STEVEN ROBINSON THE LEXINGTON AT WFT SQ 460 9TH ST NW WASHINGTON DC 20004	DATE: 06/07/04 PURPOSE: VOID CHECK #5010 04/26/00 CATEGORY: FUNDRAISING EVENT: #6,434.15	-\$345.00		
HOPE CREEK P.O. BOX 93205-B	DATE: 06/22/04 PURPOSE: SUPPLIES CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	2,647.44		2,117.95
ATLANTA GA 31193-2058	DATE: 06/29/04 PURPOSE: PHOTOGRAPHY COST CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	490.50	39.24	451.26
BAILEYJUR PHOTOGRAPHY 2661 MISSION ST.	DATE: 06/29/04 PURPOSE: PHOTOGRAPHY COST CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	-\$4,52,724.05		
SUN MARIN CO 91108	DATE: 06/15/04 PURPOSE: SUPPLIES CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	1,400.00	112.00	1,288.00
A BED OF ROSES PO BOX 1775F	DATE: 06/15/04 PURPOSE: SUPPLIES CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	-\$52,724.05		
BEVERLY EILLS CA 50209	DATE: 06/15/04 PURPOSE: CONSULTING CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	-\$452,724.05		
BENEDETTE & PARIS 1129 EAST CLARK ST SUITE 300 RICHMOND VA 23219	DATE: 06/22/04 PURPOSE: LODGE CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	416.36	33.31	383.05
THE BENSON HOTEL 309 SW BROADWAY PORTLAND OR 97205	DATE: 06/22/04 PURPOSE: LODGE CATEGORY: FUNDRAISING EVENT: #6 EVENT SYTD:	-\$452,724.05		
	PAGE TOTAL	11,758.23	1,199.82	10,559.41

DISBURSEMENT SCHEDULE H4  
RON DATE: 07/11/-0

REPUBLICAN NATIONAL COMMITTEE  
JOINT FEDERAL/NON FEDERAL  
ACTIVITY SCHEDULES

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
MID-EASTERN ADVERTISING 6741 WHITE STONE RD.	DATE: 06/08/00 PURPOSE: PRINTING COST CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	1,676.89	134.15	1,543.74
BALTIMORE MD 21207-4101	DATE: 06/15/00 PURPOSE: FUNRAISING CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	5,268.90	4,647.39
PRESENTATION SVCS/CENT PLAZA 2025 AVE OF THE STARS LOS ANGELES CA 90067	DATE: 06/15/00 PURPOSE: VIDEO SVCS CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	421.51	454.76
THE RITZ-CARLTON-BUCKHEAD 1434 PEACHTREE RD NE ATLANTA GA 30326	DATE: 06/15/00 PURPOSE: ROOM, CATERING CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	39.54	454.76
STEVEN ROBINSON THE LEXINGTON AT MKT 30 400 8TH ST NW WASHINGTON DC 20004	DATE: 06/07/00 PURPOSE: VOID CHECK 35010 06/28/00 CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	.00	-3,250.00
RSF MANAGEMENT 10877 MILLSHIRE BLVD #2100 LOS ANGELES CA 90024	DATE: 06/16/00 PURPOSE: AIR FARE CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	253.50	233.28
SIR SPEEDY 4380 5 SYROCCO ST #101 DENVER CO 80237-2607	DATE: 06/15/00 PURPOSE: SUPPLIES CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	48.00	44.16
SWISSOTEL/BOSTON ONE AVE DELAPAYETTE BOSTON MA 02111	DATE: 06/08/00 PURPOSE: CONFERENCE ROOM CATEGORY: FUNDRAISING EVENT: \$6 EVENT \$YTD:	\$452,724.05	220.00	3,680.00
			4,000.00	
				7,552.26
	PAGE TOTAL	\$491.59	939.31	

